UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| UNITED STATES OF AMERICA |) |
|-------------------------------|----------------------------|
| |) |
| v. |) |
| |) Criminal No. 22-2322-MBB |
| ESTARLIN ORTIZ-ALCANTARA; |) |
| YEURY GARCIA RODRIGUEZ; MARIO |)) |
| RAFAEL DOMINGUEZ-ORTIZ; EDWIN |) |
| COLLAZO; REBECCA |) |
| BARTHOLOMEW; MICHAEL |) |
| PACHECO; JOSE SANTIAGO; JASON |) |
| CRUZ; AND FNU LNU 1 |) |
| • |) |
| Defendants |) |

Dated: July 19, 2022

GOVERNMENT'S MOTION TO UNSEAL COMPLAINT

The United States Attorney hereby respectfully moves the Court to unseal the complaint and supporting affidavit. As grounds for this motion, the government states that there is no need to keep this matter secret as all nine defendants have been arrested and are in custody.

Respectfully submitted,

RACHAEL S. ROLLINS United States Attorney

By: /s/ John T. Mulcahy
John T. Mulcahy
Assistant U.S. Attorney